

**EXH. PRM-15
DOCKET UE-220216
PSE'S PENALTY MITIGATION
WITNESS: PATRICK R. MURPHY**

**BEFORE THE
WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Petition of

PUGET SOUND ENERGY

**For Penalty Mitigation Associated with
Service Quality Index No. 11-Electric
Safety Response Time Annual
Performance for Period Ending
December 31, 2021**

Docket UE-220216

**FIRST EXHIBIT (NONCONFIDENTIAL) TO THE
PREFILED REBUTTAL TESTIMONY OF**

PATRICK R. MURPHY

ON BEHALF OF PUGET SOUND ENERGY

FEBRUARY 17, 2023

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

**Docket UE-220216
Puget Sound Energy
PSE 2022 SQI No. 11 Penalty Mitigation Petition**

Public Counsel Data Request No. 013:

Refer to the Direct Testimony of Patrick R. Murphy, Exh. PRM-1T, at 10:11–15. Please indicate whether the following weather events described in Witness Murphy’s testimony and listed below coincide with Major Event Days or performance measurement suspension. If yes, please quantify the number of days performance measurement was suspended.

- a) Significant wind and rainstorm in January
- b) Heavy snow in February
- c) Record-breaking June heat
- d) Wettest fall on record
- e) November-December atmospheric rivers

Response:

Yes, the events mentioned in the Prefiled Direct Testimony of Patrick R. Murphy, Exh. PRM-1T, at 10:11–15 coincide with Major Event Days or performance measurement suspension. The following list provides the number of days performance measurement was suspended. This list does not include all days where performance measurement was suspended, only those that correspond with the referenced events.

- a) Significant wind and rainstorm in January
 - a. Days performance measurement suspended (10 days):
 - i. January 2 – Localized Emergency Event Day
 - ii. January 4 – Localized Emergency Event Day
 - iii. January 5 – Localized Emergency Event Day
 - iv. January 8 – Localized Emergency Event Day
 - v. January 12 through 7 – Major Event
- b) Heavy snow in February
 - a. Days performance measurement suspended (6 days):
 - i. February 11 – Localized Emergency Event Day
 - ii. February 13 – Localized Emergency Event Day
 - iii. February 14 – Localized Emergency Event Day
 - iv. February 15 – Localized Emergency Event Day

- v. February 21 – Localized Emergency Event Day
- vi. February 26 – Localized Emergency Event Day
- c) Record-breaking June heat
 - a. Days performance measurement suspended (4 days):
 - i. June 26 – Localized Emergency Event Day
 - ii. June 27 – Localized Emergency Event Day
 - iii. June 28 – Localized Emergency Event Day
 - iv. June 29 – Localized Emergency Event Day
 - d) Wettest fall on record
 - a. Days performance measurement suspended (8 days):
 - i. September 17 through 19 – Major Event
 - ii. October 21 – Localized Emergency Event Day
 - iii. October 24 through 27 – Major Event
 - e) November-December atmospheric rivers
 - a. Days performance measurement suspended (19 days):
 - i. November 4 – Localized Emergency Event Day
 - ii. November 9 – Localized Emergency Event Day
 - iii. November 11 – Localized Emergency Event Day
 - iv. November 12 – Localized Emergency Event Day
 - v. November 14 through 18 – Major Event
 - vi. November 25 – Localized Emergency Event Day
 - vii. November 27 – Localized Emergency Event Day
 - viii. December 10 – Localized Emergency Event Day
 - ix. December 11 – Localized Emergency Event Day
 - x. December 18 – Localized Emergency Event Day
 - xi. December 25 – Localized Emergency Event Day
 - xii. December 26 – Localized Emergency Event Day
 - xiii. December 27 – Localized Emergency Event Day
 - xiv. December 28 – Localized Emergency Event Day
 - xv. December 30 – Localized Emergency Event Day

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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WUTC STAFF DATA REQUEST NO. 009:

REQUESTED BY: Andrew R. Roberts

Please provide a table showing the number of incidents included in the SQI No. 11 calculation each year beginning in 2014 through 2021. In addition, please separately provide the total number of incidents excluded from the SQI No. 11 calculation each year 2014 through 2021?

Response:

Please see the below table for the number of incidents included and excluded in the SQI No. 11 calculation each year beginning in 2014 through 2021.

Year	Included Incidents	Excluded Incidents
2014	7,225	5,419
2015	7,149	7,079
2016	7,825	4,986
2017	7,508	6,734
2018	6,784	4,946
2019	7,030	6,390
2020	6,552	6,927
2021	7,307	9,141

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WUTC STAFF DATA REQUEST NO. 011:

REQUESTED BY: Andrew R. Roberts

Mr. Murphy, in Exhibit PRM-1T, on pages 23 and 24, discusses efforts to increase Electric First Responder staffing from 77 to 89 employees. When it became apparent that PSE was not going to reach its goal of increasing staffing, what, if anything was done to onboard more EFR staff?

Response:

Puget Sound Energy's ("PSE") efforts to hire new electric first responder line workers occurred continuously through the year, which were driven by existing vacancies as well as attraction for the new full-time employee positions added in July, 2021. PSE's ability to reach full staffing was impacted by new-employee training timelines, as well as the unexpected early retirements that occurred in the 3rd and 4th quarter. As stated on page 30 of the Prefiled Direct Testimony of Patrick R. Murphy, Exh. PRM-1T, PSE completed market-driven wage increases for electric first responders in December 2021 in order to attract more qualified electric first responders.

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WUTC STAFF DATA REQUEST NO. 012:

REQUESTED BY: Andrew R. Roberts

Mr. Murphy, in Exhibit PRM-1T, on pages 28 and 29, discusses the average travel time and extreme travel events experienced in 2021. Does the 2021 average travel time of 46 minutes include the 257 extreme travel events also experienced in 2021?

Response:

Yes, the 2021 average travel time of 46 minutes includes the 257 extreme travel events experienced in 2021.

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

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WUTC STAFF DATA REQUEST NO. 013:

REQUESTED BY: Andrew R. Roberts

Please provide the number of SQI No. 11 incidents for each year 2014-2021 in which electric first responder staff were responding to incidents outside of their local area.

Response:

The below table provides the number of SQI No. 11 incidents for each year 2014-2021 in which electric first responder staff were responding to incidents outside of their local area.

Year	Number of SQI 11 Incidents
2014	145
2015	174
2016	263
2017	252
2018	665
2019	236
2020	353
2021	413